

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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In re:

Tyra Stokes

Debtor(s).

Case No. 16-21749-BEH  
Chapter 13

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**NOTICE AND REQUEST TO MODIFY CONFIRMED CHAPTER 13 PLAN**

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Tyra Stokes filed papers with the Court requesting modification of the confirmed Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to confirm the modified plan as proposed, or if you want the Court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the Court a written request for hearing that contains a short and plain statement of the factual and legal basis for the objection. File your written request electronically or mail it to:

Clerk of Bankruptcy Court  
517 E. Wisconsin Avenue  
Room 126  
Milwaukee, WI 53202-4581

If you mail your request to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the expiration of 21 days.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and may enter an order confirming the modified plan.

Michael J. Watton, Esq.  
Attorney for Debtors  
Watton Law Group  
301 West Wisconsin Avenue, 5<sup>th</sup> Floor  
Milwaukee, Wisconsin 53203

### REQUEST TO MODIFY CONFIRMED CHAPTER 13 PLAN

1. The person requesting this plan modification is:  
☒ the Debtor;  
☐ the Chapter 13 Trustee;  
☐ the holder of an unsecured claim, Name: \_\_\_\_\_
2. Service: A certificate of service must be filed with this request for plan modification. Designate one of the following:  
  
☒ A copy of this proposed modification has been served on the parties (the debtors, the trustee, the United States trustee and all creditors) as required by Fed. R. Bank. P. 3015(g); or  
  
☐ A motion requesting limited service is being filed simultaneously with the Court.
3. I request the following modification of the Chapter 13 Plan last confirmed by the Court:

Payments to the Trustee: The future earnings or other future income of the Debtor is submitted to the supervision and control of the trustee. The Debtor (or the Debtor's employer) shall pay to the trustee the sum of \$13,369.00 through November 28, 2017 and 407.33 per month for the remaining 49 months with no payments in July and August.

Estimated Total of plan payments: \$30,069.67

Plan Length: This plan is estimated to be for 60 months.

Beginning with 2017 tax refunds received in 2018, no tax refunds will be paid into the plan. Tax refunds are accounted for in the Debtor's budget.

Debtor's attorney fees shall now be \$4,000.00 pursuant to Debtor's agreement with counsel to pay an additional \$250.00 with the filing of this post-confirmation amended plan. The Trustee shall distribute the additional fees according to the previous confirmed plan.

All remaining terms of the Chapter 13 Plan confirmed on June 14, 2017 are unaffected. In the event of a conflict between the terms of the confirmed Plan and the terms of this modification, the terms of this modification control.

WHEREFORE, the proponent requests that the Court approve this modification to the confirmed Chapter 13 Plan.

#### **CERTIFICATION**

Each proponent or the attorney for each proponent must sign this certification. If the proponent is the Debtor, the Debtor's attorney must sign this certification, and the Debtor may, but is not required to sign. If the Debtor does not have an attorney, the Debtor must sign this certification.

**The provisions in this modified Chapter 13 plan are identical to those contained in the official local form other than the changes listed in part 3.**

I certify under penalty of perjury that the foregoing is true and correct.

Respectfully submitted November 29, 2017.

Timothy H. Hassell  
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